

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

WALTER PICKETT, individually, and on  
behalf of others similarly situated,

Plaintiff,

v.

SIMOS INSOURCING SOLUTIONS,  
CORP., a Georgia corporation,

Defendant.

No. 17 Civ. 1013

Hon. Matthew F. Kennelly

---

**PLAINTIFF’S MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT  
AND CERTIFICATION OF SETTLEMENT CLASSES**

For the reasons set forth in the Memorandum of Law in Support of Plaintiff’s Motion for Final Approval of Class Action Settlement and Certification of Settlement Classes, and Class Counsel’s supporting declarations and exhibits, Plaintiff respectfully requests that the Court enter an Order:

- (1) Certifying the Settlement Classes;
- (2) Approving as fair and adequate the class-wide settlement of this action as set forth in the Joint Stipulation of Class Action Settlement and the Second Addendum to the Settlement Agreement; and
- (3) Incorporating the terms of the Joint Stipulation of Class Action Settlement and the Second Addendum to the Settlement Agreement.

Pursuant to the Court’s Case Procedure Rules, Plaintiff will provide the Court with a proposed order after the Motion is presented in open court.

Dated: July 18, 2017  
New York, New York

Respectfully submitted,

/s/ Ossai Miazad

**OUTTEN & GOLDEN LLP**

Ossai Miazad  
Christopher M. McNerney  
685 Third Ave, 25th Floor  
New York, New York 10017  
Tel.: (212) 245-1000

Paul W. Mollica  
161 North Clark Street  
Suite 1600  
Chicago, Illinois 60601  
Telephone: (312) 809-7010  
Facsimile: (312) 809-7911

*Attorneys for Plaintiff and the Putative  
Settlement Classes*

**CERTIFICATION OF SERVICE**

I hereby certify that on **July 18, 2017**, a copy of the foregoing document was filed electronically and service made by certified mail to anyone unable to accept electronic filing. Notice of this filing will be sent by email to all parties by operation of the Court's electronic filing system or by certified mail for anyone unable to accept electronic filing. Parties may access this filing through the Court's system.

/s/ Ossai Miazad  
Ossai Miazad